

EXHIBIT AA

Paul A. Woodard

From: Ken Hiller <khiller@kennethhiller.com>
Sent: Monday, November 21, 2016 4:44 PM
To: Paul A. Woodard
Cc: sandrews@kennethhiller.com; 'Tim Hiller'
Subject: RE: Wagner v. Chiari & Ilecki

Paul,

I have some concerns. Our agreement was that we would agree to the accuracy of the account log. Paragraph number 11 incorporates that understanding. All of the other Notices to Admit are attempts by the Defendant to editorialize on the notes.

We also never agreed that any of this evidence would be admissible. In fact, we fully intend to object to the admission of any of the matters in the Notices to Admit as irrelevant. As such, we cannot agree to the portion of the stipulation that states that the admitted facts may be offered at trial.

Numbers 9 and 10 are not only irrelevant, but display the obvious intent of the Defendant to make our law firm the issue in this trial. It is apparent that you want to portray our firm as more interested in suing than resolving the dispute. This brings our lawfirm's practices and procedures into play; the very matters that were at issue in the Clayson and Ford cases that your firm represented my firm in. I think that clearly puts your firm in a conflict of interest.

I think at this juncture it is best to bring this matter before the Court. I am willing to discuss any possible resolution you might suggest to this dispute. Please advise me by the close of business Wednesday of your position.

Kenneth Hiller
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Amherst, NY 14226
716-564-3288

From: Paul A. Woodard [<mailto:paw@connorsllp.com>]
Sent: Wednesday, November 16, 2016 7:56 PM
To: Kenneth Hiller <khiller@kennethhiller.com>
Cc: Seth Andrews <sandrews@kennethhiller.com>; Terrence M. Connors <tmc@connorsllp.com>
Subject: Wagner v. Chiari & Ilecki

Ken,

Further to our discussion last week, I enclose our requests for admission and a proposed stipulation. As discussed, if plaintiff admits each of the requests for admission and you agree to the terms of the stipulation, we will withdraw our notice of Seth Andrews' deposition.

Thank you for your attention to this matter. Of course, if you would like to discuss this matter further, please feel free to contact me.

Best regards,

Paul

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